

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

RESIDENTIAL CAPITAL, LLC, et al.,
Post-Effective Date Debtors

Chapter 11

RESCAP BORROWER CLAIMS TRUST,
Objector

Case No. 12-12020-mg

v.
TIA DANIELLE SMITH,
Creditor-Beneficiary

STATEMENT ON CASE STATUS REPORT

PLEASE TAKE NOTICE that Tia Danielle Smith, by her attorney, Wendy Alison Nora of ACCESS LEGAL SERVICES, states that she did not received the Court's Final Pre-Trial Order entered on February 1, 2016 until the morning of February 2, 2016, when she returned to her Madison, Wisconsin office from the Milwaukee airport where her return flight from LaGuardia Airport in New York landed at approximately 4:00 p.m. Central Time on February 1, 2016. She arrived at her Madison, Wisconsin office after 6:00 p.m. Central Time. Because she was en route from the Court to Milwaukee for much of February 1, 2016, she was unavailable to confer with counsel for the Objector on February 2, 2016 and, by the time she completed her filing of the Indexes, Sub-Indexes and Exhibits in the contested claims proceedings and retrieved her February 1, 2016 mail and CM/ECF notices, it was after 5:00 p.m. Eastern Time. She saw that the Court had set a deadline for 5:00 p.m. Eastern Time on February 1, 2016 for the filing of a Case Status Report, which was not possible because she was on an airplane until that time and could not use her cellular telephone from approximately 2:30 p.m. Eastern Time until 5:00 p.m.

Eastern Time. She does not believe that counsel for the Objectors has her cellular telephone number or if they tried to contact her on February 1, 2016. She asks this Court to **extend the date and time for filing the Case Status Report to 5:00 p.m. Eastern Time on February 4, 2016**, because she will be traveling to Minneapolis from Madison for a 3:00 p.m. Central Time court appearance on February 3, 2016 and was informed by her office that Minneapolis is experiencing blizzard conditions, so she did not undertake the trip today. She respectfully represents that compliance with the February 1, 2016, 5:00 p.m. Eastern Time deadline for filing the Case Status Report was not possible and that good cause exists to extend the date and time for its filing to **5:00 p.m. Eastern Time on February 4, 2016**, for the reasons stated herein.

Dated at Madison, Wisconsin this 2nd day of February, 2016.

/s/ Wendy Alison Nora

Wendy Alison Nora
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